

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SHOKOFEH TABARAIE, DDS, PLLC,

Plaintiff,

v.

ASPEN AMERICAN INSURANCE
COMPANY,

Defendant.

Civil Action No. 2:20-cv-01035-RSL

**STIPULATED MOTION AND
ORDER TO EXTEND TIME**

Plaintiff Shokofeh Tabaraie, DDS, PLLC and Defendant Aspen American Insurance Company stipulate that Defendant's deadline to answer or otherwise respond to the Complaint in this action is extended for a total of 14 days to August 31, 2020.

WHEREAS:

1. Defendant's current deadline to answer or otherwise respond to the Complaint is August 17, 2020.

2. Due to the COVID-19 pandemic and related matters, Defendant and its counsel require additional time to investigate certain allegations in the complaint.

3. The Parties have met and conferred and Plaintiff has agreed to extend Defendant's deadline to answer or otherwise respond to the Complaint by 14 days to August 31, 2020.

4. The Parties represent that this stipulated motion is made in the interest of justice, not to delay the proceedings, and will not prejudice any party;

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that Defendant's deadline to answer or otherwise respond to the Complaint shall be extended from August 17, 2020 to August 31, 2020.

The Parties respectfully request the Court to enter the accompanying Proposed Order extending Defendant's deadline to answer or otherwise respond to the Complaint to August 31, 2020.¹

DATED this 12th day of August, 2020.

PRESENTED BY:

RUIZ & SMART
PLAINTIFF LITIGATION PLLC

SIDLEY AUSTIN LLP

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¹ Aspen American Insurance Company expressly reserves its rights, subject to, and without waiving, its ability to challenge in personam jurisdiction and assert any defense to this action, including, but not limited to, its rights to move to dismiss based on jurisdiction, arbitration, venue, and/or failure to state a claim.

1 **Signed with permission.*

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4 *Attorneys for Defendant*

ORDER

The Court has considered Defendant Aspen American Insurance Company's Stipulated Motion and [Proposed] Order to Extend Time. The Court HEREBY ORDERS that the deadline for Defendant to answer or otherwise respond to the complaint in the above-captioned matter is extended to August 31, 2020.

IT IS SO ORDERED.

DATED this 12th day of August, 2020.



Honorable Robert S. Lasnik
UNITED STATES DISTRICT JUDGE

SIDLEY AUSTION LLP

PRESENTED BY:

/s/ Robin E. Wechkin

DATED this 12th day of August, 2020.

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